

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

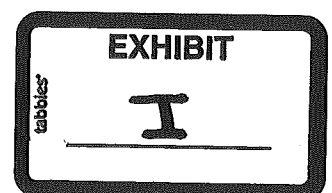
GREENWICH INVESTORS XXIV, LLC,)	
)	
Plaintiff,)	
)	
v.)	No. 07 C 6466
)	
WALTER JOHNSON II, ANN L.)	
DOMAKAITIS, A AND W, INC. AND)	
ENTERPRISE INDUSTRIES, INC.,)	
)	
Defendant.)	

AFFIDAVIT OF JASON D. ALTMAN IN
SUPPORT OF REASONABLE ATTORNEYS' FEES AND COSTS

Jason D. Altman, being duly sworn on oath, states that he is one of the attorneys for the Plaintiff, Greenwich Investors XXIV, LLC ("Greenwich"), that he is a partner with the law firm of Kluever & Platt, LLC, that he was admitted to the Illinois bar in 1994, and that he has personal knowledge of the facts contained herein, that the same are true in substance and on fact, and that if sworn to testify in connection with the present matter, he could competently state the facts set forth below:

1. It was and continues to be in the regular course of its business for the law firm of Kluever & Platt, LLC to make and keep records concerning the time spent by members of the firm in connection with various matters handled by the firm and to prepare such records in a reasonable time.

2. From August 20, 2007 through the date hereof, Kluever & Platt, LLC has represented Greenwich in the prosecution of this action. I have been actively involved in this litigation.



3. During the period of time from August 20, 2007 to the present, Kluever & Platt, LLC in the regular course of its business did prepare and keep time records concerning this legal proceeding.

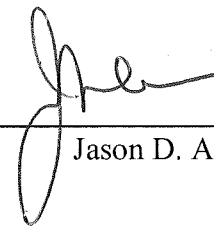
4. In connection with the representation of Greenwich, my billing rate for this file was \$255.00 - 295.00 per hour.

5. In addition to the above, the time of another attorney, Jeremy P. Kreger (admitted in Illinois in 2003) was billed at a rate of \$210.00 per hour.

6. In connection with the prosecution of this action, Kluever & Platt, LLC has expended a total of approximately 34.8 hours that were directly attributed to the prosecution of this action in the amount of \$9,868.00 and costs of \$963.22. An itemized fee statement is attached and incorporated hereto as Exhibit A.

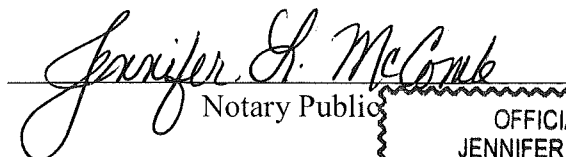
7. The fees incurred by Kluever & Platt, LLC were necessary to prosecute this litigation, are reasonable and reflect the amounts customarily charged for similar services by attorneys of similar qualifications and experience in the community.

Further Affiant sayeth naught.

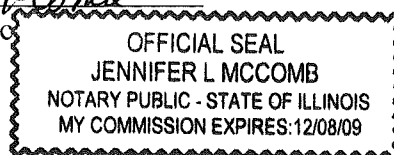


Jason D. Altman

SUBSCRIBED AND SWORN TO
Before me this 15th day of May, 2008



Notary Public



Law Offices

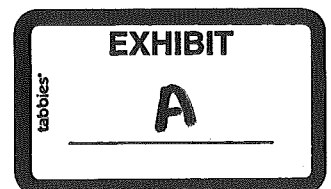
KLUEVER & PLATT, LLC65 E. Wacker Place, Suite 2300
Chicago, IL 60601Telephone
(312) 236-0077

FEIN No. 36-4445661

May 15, 2008

Greenwich Investors XXIV, LLC
Dennis Carlton, Esq.
559 San Ysidro Road, Suite 1
Santa Barbara CA 93108Please reference our Invoice and
File numbers on your remittance:**Invoice No.: 0****File No.: Gren.0010.12****INVOICE****Referral Date:**
Bankruptcy Case #:
Invoice Type:**In Reference To: Greenwich Investors XXIV, LLC**
Borrower: Walter Johnson II and Ann L. Domikaitis
Suit on Guarantees
Loan Date: 3/17/03
Loan Number: 02000552766**Description**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/29/2007 - JDA Conference with David C. Kluever regarding suit on personal guaranty.	255.00/hr	0.40	102.00
11/7/2007 - JDA Begin preparation of complaint against Johnson and Domakatis.	255.00/hr	2.70	688.50
11/8/2007 - JDA Complete preparation of complaint against Johnson, Domikatis A and W, Inc. and Enterprise Industries, Inc. Correspond with Mr. Carlton and Ms. Powell regarding diversity of citizenship issues.	255.00/hr	2.80	714.00
12/26/2007 - JDA Review court order regarding setting of initial court status hearing.	255.00/hr	0.20	51.00
- JDA Prepare motion for leave to file amended complaint.	255.00/hr	0.30	76.50
1/2/2008 - JDA Court appearance regarding status hearing and motion for leave to file amended complaint.	255.00/hr	1.00	255.00
1/21/2008 - JDA Prepare motion for default judgment and affidavit of Brooke Powell in support.	295.00/hr	0.90	265.50



KLUEVER & PLATT, LLC**Greenwich Investors XXIV, LLC****Page No. 2****Greenwich Investors XXIV, LLC****Borrower: Walter Johnson II and Ann L. Domikaitis****Suit on Guarantees****Loan Date: 3/17/03****Loan Number: 02000552766****Invoice No.****May 15, 2008**

			<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
1/22/2008 - JDA	Complete preparation of motion for default judgment and affidavits of Brooke Powell and Jason Altman in support of motion for default judgment.		295.00/hr	0.90	265.50
1/23/2008 - JDA	Prepare correspondence to Brooke Powell and Dennis Carlton regarding litigation and motion for default judgment.		295.00/hr	0.10	29.50
1/29/2008 - JDA	Revise affidavit of Brooke Powell in support of motion for default judgment. Correspond with Brooke Powell regarding same.		295.00/hr	0.50	147.50
2/8/2008 - JDA	Correspond with Dennis Carlton and Brooke Powell regarding appearance of counsel for defendants and potential settlement proposal. Review defendants' motions to vacate default and for extension of time to respond to amended complaint.		295.00/hr	0.50	147.50
2/12/2008 - JDA	Review court order on defendants' motion to vacate and for an extension to respond to amended complaint.		295.00/hr	0.20	59.00
2/18/2008 - JDA	Telephone conference with and review correspondence from opposing counsel regarding settlement proposal. prepare correspondence to and review correspondence from Mr. Carlton and Ms. Powell regarding settlement proposal.		295.00/hr	0.60	177.00
2/19/2008 - JDA	Telephone conference with Brooke Powell regarding terms of settlement offer from defendants.		295.00/hr	0.20	59.00
2/21/2008 - JDA	Correspond with Brooke Powell regarding status of settlement negotiations. Review correspondence from Dennis Carlton regarding settlement negotiations. Telephone conference with opposing counsel regarding ongoing settlement negotiations.		295.00/hr	0.60	177.00
2/22/2008 - JDA	Telephone conference and correspond with opposing counsel regarding settlement negotiations and Enterprise job backlog. Review correspondence from Mr. Carlton regarding settlement negotiations.		295.00/hr	0.60	177.00

KLUEVER & PLATT, LLC**Greenwich Investors XXIV, LLC****Page No. 3****Greenwich Investors XXIV, LLC****Borrower: Walter Johnson II and Ann L. Domikaitis****Suit on Guarantees****Loan Date: 3/17/03****Loan Number: 02000552766****Invoice No.****May 15, 2008**

			<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
2/26/2008 - JDA	Review correspondence from opposing counsel regarding ongoing projects of Enterprise. Review contracts for said projects.	295.00/hr	0.40	118.00	
2/27/2008 - JDA	Prepare correspondence to and review correspondence from Dennis Carlton regarding collateral and security issues concerning proposed settlement offer.	295.00/hr	0.60	177.00	
3/4/2008 - JDA	Telephone conference with Mr. Carlton regarding ongoing settlement negotiations and potential security/collateral for settlement payments.	295.00/hr	0.20	59.00	
3/5/2008 - JDA	Telephone conference with opposing counsel regarding request for financial statements and tax returns to determine potential source of security for settlement payment schedule proposed by defendants.	295.00/hr	0.20	59.00	
3/7/2008 - JDA	Telephone conference with opposing counsel regarding providing financial statements and tax returns of defendants.	295.00/hr	0.20	59.00	
3/14/2008 - JDA	Correspond with Mr. Carlton regarding tax returns and financial statements of defendants. Review said tax returns and financial statements.	295.00/hr	1.50	442.50	
3/17/2008 - JDA	Correspond and telephone conference with Mr. Carlton regarding terms of settlement payment plan from defendants. Telephone conference with opposing counsel regarding settlement negotiations. begin preparation of settlement agreement and mutual releases.	295.00/hr	1.60	472.00	
3/18/2008 - JDA	Prepare settlement agreement, mutual releases, consent decree and motion for entry of consent decree. Calculate interest and fees and costs to be paid as part of settlement. prepare correspondence to Mr. Carlton regarding proposed settlement documents.	295.00/hr	4.10	1,209.50	
3/19/2008 - JPK	Attendance at status hearing.	210.00/hr	1.20	252.00	
3/20/2008 - JDA	Review court order regarding status hearing. Telephone conferences with Brooke Powell regarding proposed settlement agreement.	295.00/hr	0.30	88.50	

KLUEVER & PLATT, LLC**Greenwich Investors XXIV, LLC****Page No. 4****Greenwich Investors XXIV, LLC****Borrower: Walter Johnson II and Ann L. Domikaitis****Suit on Guarantees****Loan Date: 3/17/03****Loan Number: 02000552766****Invoice No.****May 15, 2008**

			<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
3/31/2008 - JDA	Revise settlement agreement and consent decree. Prepare correspondence to Dennis Carlton and opposing counsel regarding settlement agreement and consent decree.		295.00/hr	1.20	354.00
4/3/2008 - JDA	Telephone conference with opposing counsel regarding settlement agreement and consent decrees.		295.00/hr	0.10	29.50
4/4/2008 - JDA	Review correspondence from and telephone conference with opposing counsel regarding proposed revisions to settlement agreement and consent decree. Telephone conference with and correspondence to Mr. Carlton regarding proposed revisions. Revise settlement agreement and consent decree.		295.00/hr	1.40	413.00
4/7/2008 - JDA	Review correspondence from and prepare correspondence to Dennis Carlton regarding executed settlement agreement. Execute consent decree. Prepare correspondence to opposing counsel regarding execution of settlement agreement and consent decree.		295.00/hr	0.50	147.50
4/8/2008 - JDA	Review correspondence from and prepare correspondence to opposing counsel regarding executed settlement agreement and initial settlement payment.		295.00/hr	0.40	118.00
4/11/2008 - JDA	Prepare correspondence to Mr. Carlton and Ms. Powell regarding first settlement payment.		295.00/hr	0.10	29.50
4/14/2008 - JDA	Telephone conference with Brooke Powell regarding missed first settlement installment payment. Telephone conference with opposing counsel regarding missed first settlement installment payment.		295.00/hr	0.20	59.00
4/15/2008 - JDA	Prepare correspondence to Domikaitis regarding failure to make initial settlement payment.		295.00/hr	0.20	59.00
4/16/2008 - JDA	Court appearance regarding status hearing. Correspond with Mr. Carlton regarding status of settlement.		295.00/hr	1.20	354.00
4/28/2008 - JDA	Review correspondence from opposing counsel regarding wire transfer of first settlement payment. prepare correspondence to and review correspondence from Brooke Powell regarding confirmation of wire transfer.		295.00/hr	0.30	88.50

KLUEVER & PLATT, LLC**Greenwich Investors XXIV, LLC****Page No. 5****Greenwich Investors XXIV, LLC****Borrower: Walter Johnson II and Ann L. Domikaitis****Suit on Guarantees****Loan Date: 3/17/03****Loan Number: 02000552766****Invoice No.****May 15, 2008**

			<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
4/29/2008 - JDA	Correspond and telephone conference with Brooke Powell and Dennis Carlton regarding settlement payment status and litigation options. Telephone conferences with opposing counsel regarding settlement payment status.	295.00/hr	1.00	295.00	
5/1/2008 - JDA	Correspond with Brooke Powell regarding settlement payment status.	295.00/hr	0.10	29.50	
5/2/2008 - JDA	Telephone conference with Brooke Powell regarding staus of second settlement installment payments. Prepare notice of missed settlement installment correspondence to defendants.	295.00/hr	0.40	118.00	
5/6/2008 - JDA	Review correspondence from Brooke Powell regarding no settlement payment. Telephone conferences with with opposing counsel regarding missed settlement payments and court hearing.	295.00/hr	0.50	147.50	
5/7/2008 - JDA	Court appearance regarding status hearing. Prepare correspondence to Brooke Powell regarding settlement paycheck.	295.00/hr	1.20	354.00	
5/8/2008 - JDA	Review correspondence from and prepare correspondence to opposing counsel regarding wire transfer to Greenwich. Correspond with Brooke Powell regarding same.	295.00/hr	0.30	88.50	
5/12/2008 - JDA	Correspond with Brooke Powell regarding status of next settlement payment.	295.00/hr	0.20	59.00	
5/13/2008 - JDA	Telephone conferences with opposing counsel and Ms. Powell regarding missed settlement payment. Prepare correspondence to Mr. Carlton regarding regarding missed settlement payment and moving for default judgment. review correspondence from Mr. Carlton regarding moving for default judgment. Prepare motion for default judgment and affidavit of Brooke Powell in support. Correspond with Ms. Powell regarding said affidavit.	295.00/hr	2.00	590.00	
5/14/2008 - JDA	Review correspondence from and prepare correspondence to Brooke Powell regarding affidavit. Revise Powell affidavit in support of motion for default judgment.	295.00/hr	0.70	206.50	

KLUEVER & PLATT, LLC**Greenwich Investors XXIV, LLC****Page No. 6****Greenwich Investors XXIV, LLC****Borrower: Walter Johnson II and Ann L. Domikaitis****Suit on Guarantees****Loan Date: 3/17/03****Loan Number: 02000552766****Invoice No.****May 15, 2008**

		<u>Amount</u>
Total Fees this Invoice		\$9,868.00
Costs		
		<u>Qty/Price</u>
11/12/2007 - DCK Filing Fee - US District Clerk of Court	1 350.00	350.00
11/19/2007 - JDA Service of Summons - Cadillac Investigations Johnson - 07 C 6466 - 11/19/07 - 12/22/07	1 210.00	210.00
11/20/2007 - DCK Service - Summons - Jack King 2 defendants.	2 85.00	170.00
2/11/2008 - JDA Service of Summons - Cadillac Investigations - Enterprise Industries Inc., Ann Domikaitis and Walter Johnson served	1 215.00	215.00
4/15/2008 - LAN Federal Express to Ann Domikaitis, Palos Park, IL.	1 9.11	9.11
- LAN Federal Express to Foster, Kallen & Smith, Homewood, IL.	1 9.11	9.11
Total Costs		<u>\$963.22</u>